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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

RUSSELL WILSON,	)	Case No.: 1:20-CV-01753-SKO
	)	
Plaintiff,	)	STIPULATION FOR AN EXTENSION OF
	)	TIME; ORDER
vs.	)	(Doc. 18)
	)	
KILOLO KIJAKAZI,	)	
Acting Commissioner of Social Security,	)	
	)	
Defendant.	)	

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the “Commissioner”), shall have an extension of time to file her opposition to Plaintiff’s opening brief in this case. In support of this request, the Commissioner respectfully states as follows:

1. Defendant’s response to Plaintiff’s opening brief is currently due January 25, 2022. Defendant has not previously requested an extension of time for this deadline.

2. The undersigned of counsel attorney has 15 briefs due in district court cases over the next month which must be reviewed by the undersigned Special Assistant United States Attorney prior to filing with the Court, who, in turn, has her own caseload to manage.

3. Due to the volume of the overall workload within the Region IX Office, neither the undersigned attorney nor another attorney in the Region IX Office anticipate being able to complete briefing by the current due date of January 25, 2022. Therefore, Defendant seeks an extension of 31 days, until February 25, 2022, to respond to Plaintiff's motion.

4. This request is made in good faith and is not intended to delay the proceedings.

5. On January 19, 2022, counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion.

WHEREFORE, Defendant requests until February 15, 2022, to file her opposition to Plaintiff's opening brief.

Respectfully submitted,

Dated: January 19, 2022

/s/ Jonathan Omar Pena\*

Jonathan Omar Pena

Attorney for Plaintiff

\*as authorized via e-mail on January 19, 2022

Dated: January 19, 2022

PHILLIP A. TALBERT

United States Attorney

PETER K. THOMPSON

Acting Regional Chief Counsel, Region IX

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By: /s/ Chantal R. Jenkins

CHANTAL R. JENKINS

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**ORDER**

Pursuant to the parties' foregoing stipulation (Doc. 18), and for good cause shown (*see* Fed. R. Civ. P. 16(b)(4)), IT IS SO ORDERED that Defendant shall have an extension, up to and including February 25, 2022, to respond to Plaintiff's Opening Brief.

IT IS SO ORDERED.

Dated: **January 20, 2022**

*/s/ Sheila K. Oberto*  
UNITED STATES MAGISTRATE JUDGE